

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION**

**CASE NO. 23-80101-CR-CANNON(s)**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**DONALD J. TRUMP,  
WALTINE NAUTA, and  
CARLOS DE OLIVEIRA,**

Defendants.

\_\_\_\_\_ /

**JOINT PROPOSED JURY QUESTIONNAIRE**

In accordance with the Court's order (ECF No. 244) that the parties file a joint proposed jury questionnaire denoting areas of agreement and disagreement, the Government hereby files the attached proposed questionnaire on behalf of all parties.<sup>1</sup>

The table below summarizes areas of agreement and disagreement. In addition, the document itself, using color coding, highlights the areas of disagreement. Text in **BLACK** reflects agreed upon language and questions; text in **RED** denotes language and questions the Government proposes to which the defense objects; and text in **BLUE** denotes language and questions the defense proposes to which the Government objects. At the Court's direction, the parties are prepared to file papers explaining the bases for our disagreements.

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<sup>1</sup> Earlier today, the Government filed a motion for leave to file the joint proposed questionnaire under seal. *See* ECF No. 344. That motion is now moot.

**Summary of Agreement/Disagreement**

Parties agree	1-13, 15-31, 35-45, 47, 48, 50-53, 55-60, 61, 67, 68, 83, 95-97, 99
Parties agree to inclusion of question, but differ as to language or style, as denoted by color coding	14, 46, 49, 54, 65, 69, 70, 73, 91, 92
Government proposes question and defense objects, as denoted by color coding	66, 71, 72, 74, 75, 76-80, 84-86, 90, 98
Government proposes question and defense objects; if the Court agrees with the Government, the defense requests modified language, as denoted by color coding	81-82
Defense proposes question and Government objects, as denoted by color coding	32-34, 62-64, 87-89, 93, 94
Other disagreements, as denoted by color coding	<p>“Knowledge of Trial Participants and the Case” explanation (between questions 60 and 61) – parties disagree as to language.</p> <p>Certification page – parties disagree as to method for signing/anonymizing</p>

Respectfully submitted,  
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N.Y. Bar No. 2678084

By: /s/ David V. Harbach, II  
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February 28, 2024

**CERTIFICATE OF SERVICE**

I hereby certify that on February 28, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which in turn serves counsel of record via transmission of Notices of Electronic Filing.

/s/ David V. Harbach, II  
David V. Harbach, II